

## United States District Court

United States District Court  
Southern District Of Texas  
FILED

SOUTHERN

DISTRICT OF

TEXAS

UNITED STATES OF AMERICA

McAllen Division

NOV 02 2019

V.

CRIMINAL COMPLAINT

TREVINO, Jannette

YOB: 1990

COC: United States

David J. Bradley, Clerk  
Case Number: M-19-

M-19-2694-M

I the undersigned complainant, state the following is true and correct to the best of my knowledge and belief. On or about November 1, 2019 in STARR County, in the Southern District of Texas defendant(s) did,

knowing or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States violation of law, transports, or moves or attempts to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law and brought the alien for the purpose of commercial advantage or private gain,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) & 1324(a)(2)(B)(ii)

Knowingly and willfully makes any materially false, fictitious, or fraudulent statement or representation in violation of Title 18 United States Code, Section(s) 1001(a)(2)

I further state that I am a(n) Customs and Border Protection Officer and that this complaint is based on the following facts:

See attachment

Continued on the attached sheet and made a part of this complaint:

☒ Yes☐ No

Submitted by reliable electronic means, sworn to and attested to telephonically per Fed.

R. Cr. P. 4.1, and probable cause found on:

Sworn to before me and subscribed in my presence,

/s/ Victor E. Reyna

Approved By:

Alejandra Andrade

Signature of Complainant

Victor E. Reyna

Printed Name of Complainant

November 2, 2019

at

McAllen, Texas

Date

City and State

Scott Hacker

U.S. Magistrate Judge

Name and Title of Judicial Officer

Signature of Judicial Officer

**U.S. CUSTOMS AND BORDER PROTECTION**  
**Department of Homeland Security**

**Port of Rio Grande City**

317 S Pete Diaz Ave

Rio Grande City, Texas 78582

A213446653

**Attachment**

The defendant, a United States citizen attempted to bring illegally into the United States through the Rio Grande City Port of Entry an undocumented minor A.E.G.G (male, 4 years old), as a United States citizen. At vehicle primary, the defendant presented a City of McAllen, Texas Birth Certificate bearing the name J.J.P as proof.

The defendant gave misleading or made false statements to Customs and Border Protection Officers by claiming that the birth certificate bearing the name J.J.P was her child and a United States citizen.

The defendant and child were referred to vehicle secondary due to A.E.G.G appearing to be in a deep sleep and not being able to answer any of the Customs and Border Protection Officers questions.

In secondary, upon further inspection, the defendant admitted that the child was in fact not a citizen of the United States. The defendant went on to say she agreed to smuggle the child from Mexico to the United States for monetary gain. She further stated the United States Birth Certificate reflecting J.J.P did not belong to A.E.G.G.

Database queries revealed A.E.G.G. did not have any legal status to enter the United States. Subject A.E.G.G. was processed as an unaccompanied child.